

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

KEVIN HARRIS,	:	
Plaintiff,	:	Case No.: JFM-02-CV-236
vs.	:	
CLUB HOLLYWOOD, INC., <u>et al.</u> ,	:	
Defendants.	:	

CONSENT MOTION TO MODIFY SCHEDULING ORDER

The Defendants, Club Hollywood, Inc., Harvey Blonder, Jeffrey P. Goldstein, and Roberta L. Goldstein, by and through their respective and undersigned counsel, respectfully move this Honorable Court to again modify the Scheduling Order pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 105.9 and 103.9 and to extend the deadline for the Defendants to file a dispositive motion by ninety (90) days. As grounds for this Motion, the Defendants state as follows:

1. The Defendants need additional time to fully explore the ongoing settlement negotiations with the Plaintiff and believe that the filing of a dispositive motion at this time will have a chilling effect upon the settlement negotiations between the Parties. Moreover, in the event that the Parties are unsuccessful in reaching an amicable resolution of this matter by July 14, 2003, the Parties will still need additional time to complete discovery and intend to file another joint motion to request that this Honorable Court grant them one further extension of the deadlines of the Scheduling Order.
2. The Plaintiff consents to this Motion.

3. The grounds and additional reasons for this Motion are set forth in the accompanying Memorandum of Reasons and Authorities in support thereof.

WHEREFORE, the Defendants respectfully request that the Scheduling Order be modified and that the deadline for the Defendants to file their dispositive motion be extended for sixty (60) days from June 30, 2003 to September 30, 2003.

Respectfully submitted,

JORDAN COYNE & SAVITS, L.L.P.

By: _____
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Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Consent Motion To Modify Scheduling Order< Memorandum of Points and Authorities, Proposed Order, were sent by facsimile and by regular mail, postage prepaid, on this 30th day of June, 2003, to:

Michael McGowan, Esquire
McGowan, Cecil & Smathers, LLC,
317 Main Street
Laurel, Maryland 20707

Deborah Murrell Whelihan